

January 6, 1993

William Buller U.S. EPA, Region V, 5HR-12 230 South Dearborn Street Chicago, Illinois 60604 JAN 7 1993

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION W

Dear Mr. Buller:

In our January 4, 1993 telephone conversation, you indicated that the Agency has requested two more changes as a condition to approval of the SOP Addendum to the October 12, 1992 Work Plan for the former Amphenol site: one relating to the type of bailer to be used, and one relating to additional sampling.

We have thoroughly reviewed the 1986 "RCRA Ground-Water Technical Enforcement Guidance Document" (TEGD - September 1986) as well as Volumes I and II of the 1989 "Interim Final RCRA Facility Investigation (RFI) Guidance". We find nothing in any of these documents requiring the exclusive use of a bottom-delivery bailer for ground water sampling work. We do note that page 106 of the TEGD specifies acceptable sampling devices for all ground water analytical parameters. It lists "Bailer (fluorocarbon resin or stainless steel), provided that it is equipped with double check valves and bottom emptying device". The TEGD also lists "Single check valve fluorocarbon resin or stainless steel bailer" without qualification or explanation. We have used the latter device on this and other ground water projects. Neither the IT Work Plan nor the Consent Order specifies a bottom delivery bailer. I have checked with a number of bailer and sampling equipment suppliers, and with Applied Research Associates in Vermont. No one makes or uses a 7/16" OD bailer with a bottom delivery. Accordingly, we believe it advisable, and well within appropriate guidelines, to use the Teflon and stainless steel single check valve bailers that we have used in the past. Field sampling personnel will transfer samples from the bailers into sample containers with a minimum of disturbance and exposure to the atmosphere in accordance with standard WWES field sampling procedures.

You also requested that a Geoprobe sample be obtained on-site at the southwest property corner near the location of former ATEC monitoring well 6, and adjacent to a large above ground

storage tank on property occupied by Farm Bureau.

We have documentation that ATEC monitoring well 6 was sampled by ATEC in 1984, sampled

again by IT in 1985, and subsequently removed by IT as one of those wells whose construction

and analytical results were suspect. No additional on-site work was proposed in that area in the

IT Work Plan, nor in the Consent Order signed by Amphenol and Franklin Power Products. Our

own RFI work has provided no information that suggests that there is a ground water

contaminant plume in that area, and the area is in fact sidegradient, or slightly upgradient from

the documented contaminant plume. For these reasons, my clients are of the opinion that the

additional on-site sampling location is neither required by the Consent Order, nor warranted by

the results of any information gathered, nor is it consistent with the intent of the SOP addendum.

The preparation of the SOP addendum was necessitated because we believe it inadvisable to

install ground water monitoring wells in off-site public rights-of-way; as an alternative we

proposed that the sampling be done by Geoprobe. The SOP addendum was prepared and

submitted to provide the Agency with procedures and documentation that the off-site samples to

be collected will be of suitable quality for contract laboratory analysis. I suggest that the SOP

addendum be approved as submitted so that we may proceed with the delineation of the area of

real concern: the plume south of Hamilton Avenue.

If you have any questions, please get in touch with me.

Very truly yours,

James H. Keith

cc:

Susan Gard Sam Waldo